

IHB File No. S3/8152

CIRCULAR LETTER 41/2004
28 June 2004

REPLIES TO CL21/2004

USE OF THE RCDS MODE OF ECDIS

(Submissions by Australia and Norway to IMO MSC/78)

Ref: A. CL21/2004
B. CL34/2004

Dear Hydrographer,

At Reference A the IHB forwarded two submissions made by Australia and Norway to the Maritime Safety Committee (MSC) of the International Maritime Organization (IMO). At Reference B the IHB reported to Member States on the replies received in response to CL21/2004. Two responses to CL21/2004 from Pakistan and the USA were not included in CL34/2004, as for some unknown reason they had not been received at the IHB. The IHB has also received a response from Peru.

The comments raised by Pakistan, Peru and the USA are shown at Annex A together with a revised summary table of all responses received.

On behalf of the Directing Committee
Yours sincerely,

(original signed)

Vice Admiral Alexandros MARATOS
President

Annex A: Revised Table of replies to CL 21/2004 dated 22 March 2004 and comments from Pakistan, Peru and USA.

Annex A to CL41/2004

**RESPONSES TO IHB CL 21/2004
USE OF THE RCDS MODE OF ECDIS**

Member State	Question 1¹	Question 2 a)²	Question 2b)³	COMMENTS
ALGERIA	NO	YES	YES	See Annex A to CL34/2004
ARGENTINA	NO	YES	YES	
AUSTRALIA	YES	NO	NO	See Annex A to CL34/2004
BAHRAIN	NO	YES	YES	
CANADA	YES	YES	YES	See Annex A to CL34/2004
CHILE	NO	YES	YES	See Annex A to CL34/2004
CHINA	NO	YES	YES	
COLOMBIA	NO	YES	YES	See Annex A to CL34/2004
CROATIA	NO	YES	NO	See Annex A to CL34/2004
DENMARK	NO	YES	YES	See Annex A to CL34/2004
ECUADOR	NO	YES	YES	See Annex A to CL34/2004
ESTONIA	NO	YES	YES	
FINLAND	NO	YES	YES	See Annex A to CL34/2004
FRANCE	NO	YES	YES	See Annex A to CL34/2004
GREECE	NO	YES	YES	
INDIA	NO	YES	YES	See Annex A to CL34/2004
ITALY	NO	YES	YES	
JAPAN	NO	NO	NO	
KOREA (Rep. of)	NO	YES	YES	See Annex A to CL34/2004
MEXICO	NO	YES	YES	See Annex A to CL34/2004
NETHERLANDS, THE	YES	NO	NO	See Annex A to CL34/2004
NORWAY	NO	YES	YES	
PAKISTAN	NO	YES	YES	See ANNEX A

¹ Do you support the Australian submission to MSC 78 “Proposal to consider permitting ships to use the Raser Chart Display System (RCDS) mode of ECDIS, without the requirement to carry paper charts” (MSC 78/24/3), as contained in Doc. WEND8-10.1A rev.1

² Do you support the Norwegian proposal to MSC 78 "Comments on MSC 78/4/3 by Australia regarding ECDIS", as contained in Annex A to this CL which recommends:

(a) A reasonable phase-in schedule for mandatory requirements for ships to carry ECDIS equipment and to use ENC where available.

³ (b) A clarification of the definition of "appropriate folio of up to date paper charts" with respect to paper charts to be carried for areas without ENC coverage and for paper charts to be carried for ECDIS back-up purposes (unless an electronic ECDIS back-up is installed).

PERU	NO	YES	YES	See ANNEX A
PORTUGAL	NO	YES	YES	
RUSSIA	NO	YES	YES	
SINGAPORE	YES	YES	NO	
SLOVENIA	NO	YES	YES	
SOUTH AFRICA	NO	YES	YES	
SPAIN	NO	YES	YES	See Annex A to CL34/2004
SWEDEN	NO	YES	YES	
THAILAND	NO	YES	YES	
TUNISIA	NO	YES	YES	See Annex A to CL34/2004
TURKEY	NO	NO	NO	
UNITED KINGDOM	YES	YES	YES	See Annex A to CL34/2004
UNITED STATES	YES	-	NO	See ANNEX A
TOTAL : MS = 33 36	YES = 5-6 NO = 28-30	YES = 29 31 NO = 4 (1 vote not recorded)	YES = 27 29 NO = 6 7	

MEMBER STATE COMMENTS

PAKISTAN

Question 1:

The proposal is not supported because of the following reasons:

- ENC, because of its standardized databases and backup, ECDIS, qualify as a standard navigation system to be adopted world wide. Allowing the use of RCDS mode of ECDIS would create a parallel system along with ENC in Marine Navigation, which is not supported.
- It is also envisaged to that countries, novice in the field of electronic charting would be discouraged by this step.
- ENC is considered a concrete step towards the safety of shipping and the peculiar features available in ENC are not put forward by RCDS mode of ECDIS.

Question 2(a) :

The proposal is supported. However, time period is making ENC a mandatory requirement needs to be deliberated upon further and a consensus must be obtained from the entire member states in this regard.

Question 2(b) :

This proposal is supported. Definition of "appropriate folios up-to -date paper charts" needs clarification. Further more the term " Backup ECDIS" for ENC also clarification in terms of hardware requirements such as separate processing unit, a separate power supply.

PERU

Question 1:

Agree to support the aim to promote the widest use of ECDIS. Raster charts are not equivalent to paper charts as ENCs. The use of Raster Charts without updated paper chart folios could be unsafely for navigation.

Question 2(a) :

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Question 2(b) :

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UNITED STATES of AMERICA

Question 1:

Australia's proposal would make it easier for mariners to adopt ECDIS by eliminating the requirement for an accompanying folio of paper charts when operating in the RCDS mode. ECDIS operating in the RCDS mode offers significant advantages over navigating using a paper chart. Those advantages include:

- The display of a vessel's position in real time over the familiar chart backdrop;
- Easy, fast, accurate updating of RNCs using official updates from hydrographic offices;
- Use of the voyage planning capabilities of ECDIS;
- Use of many of the voyage monitoring capabilities of ECDIS;
- The ability to manually add automatic, alarm-triggering points and areas;
- Convenient access to a large folio of charts via software; and
- Lower chart acquisition and maintenance costs compared to paper charts.

While ENC's offer additional benefits, that is no reason to deny or discourage mariners from achieving the benefits of the RCDS mode of operation listed above.

Arguing that full ECDIS is more capable than the RCDS mode, and therefore mariners must wait for full ECDIS, is an incorrect comparison. The correct comparison is whether the RCDS mode offers safety and convenience benefits compared to paper charts – a fact which has been demonstrated over the last several years.

Full ECDIS will succeed on its own merits as ENC's become available. It does not need a "protected" status.

Question 2(a) :

The requirement to carry "charts" is already established in SOLAS. Hydrographic offices should provide and improve tools that provide the functions of "charts". The mariner should then be free to determine which tool is most appropriate at any time as they do with positioning systems.

Unlike radar, which can be used worldwide once it is installed, ECDIS must have worldwide ENC coverage. The uncertainty of worldwide ENC coverage, and the lack of significant ECDIS experience argues against making it mandatory. The U.S. concurs with Norway's recommendation that this proposal and the Australian proposal be forwarded to the IMO Navigation Subcommittee for careful consideration.

Question 2(b) :

The situation varies among Member States with respect to the availability and coverage of raster charts. Some nations provide RNCs that are suitable for use without a folio of paper charts. Other nations with less coverage at multiple scales would prefer an accompanying paper chart for overview purposes. To accommodate both situations, standards would need to call for a substantial paper chart folio. This would be unnecessarily burdensome in nations with good RNC coverage. The present solution of letting each nation's maritime safety administration specify a minimum folio, while not optimal, is a better solution than a common specification.